

**NEWMAN | WILLIAMS**  
A PROFESSIONAL CORPORATION

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Attorney for Defendants: Jean Clark and Ronald  
Murach

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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ROBERT J. MURRAY,

Plaintiff,

v.

WYOMING COUNTY JAIL, et al.,

Defendants

No. 4:21-CV-00122

Jury Trial Demanded

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**Certificate of Service Regarding  
Defendants' Responses to Plaintiff's Discovery Requests**

The defendants, Jean Clark and Robert Murach, through their  
counsel, certify that:

1. On March 4, 2022, defense counsel sent the pro se plaintiff answers to the discovery requests he filed with the court on February 2, 2022 (ECF no. 36-1). Defendants did not receive Murray's discovery requests until he attached them to the motion he filed on February 2, 2022.

2. The discovery responses sent to Murray include 107 pages of documents including:

- a. Answers to his document requests by each defendant;
- b. All incident reports from the jail relating to the events Murray describes in his complaint;
- c. Grievances Murray filed;
- d. Two medical release forms to Wyoming Geisinger and PrimeCare Medical;
- e. A copy of the Jail's inmate Handbook; and
- f. Medical Watch Observation Sheets.

3. Defense counsel also offered to subpoena Murray's medical records provided he signed a proper medical release.

4. On March 3, 2022, Murray signed his own version of a medical release which was not the one provided. It authorizes the jail to produce his medical records and does not authorize PrimeCare to release the records. As such, it is entirely ineffective.

5. With respect to the release for Murray's Geisinger records, Murray refused to sign the release, claiming the defendants would misuse them. See excerpt of Murray's letter to defense counsel attached.

NEWMAN | WILLIAMS

By: s/Gerard J. Geiger, Esq.  
Attorney I.D. # PA44099

Date: March 11, 2022

## **Certificate of Service**

I hereby certify that on this date, I served a true and correct copy of the foregoing document on pro se plaintiff via first class mail, addressed as follows:

Robert J. Murray  
QA2794  
SCI- Dallas  
SPECIAL MAIL- OPEN ONLY IN  
THE PRESENCE OF THE INMATE  
1000 Follies Road  
Dallas, PA 18612

NEWMAN | WILLIAMS

By: s/Gerard J. Geiger, Esq.  
Attorney I.D. # PA44099

Date: March 11, 2022

knew the jail had my information from the hospital. How else would the jail know what kind of medication to give me and how much?

⑥ I can't believe you expect me to sign a release form so you can get my records from Geisinger. Then you would make copies and give a set of records to the jail ~~so~~ so they could cover their asses. You must think I'm just a dumb, uneducated, convict that doesn't have a clue, you're wrong Mr. Geiger. This is what I'm gonna do. I'm not signing your release form but I'm gonna ~~send~~ send you a copy of my release form giving the jail my permission to release any and all of my medical records. To include where, when, and by whom performed my physical and occupational therapy, any ~~at~~ and all my medical records' of the jail and the records they have from Geisinger. For which I have already requested through the defendants interrogatories and the motion for the production of documents I mailed to you on 1-24-22 that you also ignored like the interrogatories. Then I trust that you'll get the records to me once the jail has released them to you.

Case # 4:21-cv-00122  
Institution # QA2794

Sincerely,  
Robert J. Murray  
Robert J. Murray